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12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 SUNRISE HOSPITAL AND MEDICAL
CENTER, LLC,

15 Plaintiff,

16 v.

17 BLUE CROSS AND BLUE SHIELD OF
18 MICHIGAN,

19 Defendant.

Case No. 2:23-cv-00008-GMN-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANT
BLUE CROSS AND BLUE SHIELD OF
MICHIGAN TO FILE ITS RESPONSE
TO THE COMPLAINT**

(FIRST REQUEST)

RELATED ECF NO. 1

21 Plaintiff, Sunrise Hospital and Medical Center, LLC (“Plaintiff”), and Defendant Blue
22 Cross and Blue Shield of Michigan (“BCBSMI”), hereby stipulate and agree that BCBSMI shall
23 have an extension up to and including June 23, 2023, in which to file its response to Plaintiff’s
24 Original Complaint (“Complaint”) (ECF No. 1). Since BCBSMI accepted the waiver of service
25 provided by Plaintiff in this action in March of 2023 (ECF No. 10), the parties have been engaged
26 in good faith and meaningful settlement negotiations. In the interest of either completing those
27 negotiations and resolving this action completely, or commencing discovery in the alternative,
28

1 the parties wish to enter into to this stipulation and set the foregoing deadline for Plaintiff to
 2 appear in this action and respond to Plaintiff's Complaint.

3 This is the first request for an extension of time for BCBSMI to file a response to
 4 Plaintiff's Complaint. This request is made in good faith and not for the purpose of delay.

5
 6 DATED this 13th day of June 2023.

DATED this 13th day of June 2023.

7
 8 /s/ J. Malcolm DeVoy

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9 /s/ Michael Ossy

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*Authorized Representative for Blue Cross
 and Blue Shield of Michigan*

16 **ORDER**

17 **IT IS SO ORDERED.**

18 
 19 UNITED STATES ~~DISTRICT~~ JUDGE
 Magistrate

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 21 DATED: 6-15-2023
 22

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